

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

JEROME CORSI,  
*Plaintiff,*

v.

ROBERT MUELLER, et al  
*Defendants*

Civil Action No. 1:18-cv-02885

**PLAINTIFF’S REQUEST FOR VOLUNTARY RECUSAL UNDER 28 U.S.C. § 455 AND  
GENERALLY**

Plaintiff Jerome Corsi (“Plaintiff”) hereby moves this Court for an order of voluntary recusal under 28 U.S.C. § 455 in this matter only<sup>1</sup>. 28 U.S.C. § 455 provides that judge should recuse (or disqualify) himself in any proceeding in which he has “a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding.” The Honorable Carl J. Nichols (“Judge Nichols”) served as a partner at WilmerHale from 2009 until his appointment to this Court in 2019. Defendant Robert Mueller also served as a partner at WilmerHale starting in 2014 before being appointed as Special Counsel in 2017. Furthermore, Jeannie Rhee (“Ms. Rhee”), who is on Defendant Mueller’s staff, was also a partner at WilmerHale since 2006, not counting her stint at Deputy Assistant Attorney General of the U.S. Department of Justice from 2009 – 2011 and her time later on Defendant Mueller’s prosecutorial staff in the Office of Special Counsel.

Here, where Defendant Mueller and his staff, including Ms. Rhee, have been alleged to have tried to knowingly coerce false testimony from Plaintiff Corsi and threatened him with indictment when he refused to provide such false testimony, criminally leaked grand jury

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<sup>1</sup> Recusal is not requested in the undersigned counsel’s other cases before this Court, since this motion is being made due to this Court’s connection to Defendant Mueller and Ms. Rhee, both former partners of the Court at WilmerHale.

testimony and engaged in unconstitutional surveillance, there is the major appearance of personal bias or prejudice stemming from this Court and Defendant Mueller and Ms. Rhee's time together as law firm partners at WilmerHale that can only be remedied by recusal. This has led the client, Plaintiff Corsi, to request recusal. This request for voluntary recusal is not to any way impugn the integrity of the Court, only to avoid the appearance of a conflict of interest and a lack of impartiality which would otherwise seriously and irreparably taint this proceeding.

Dated: July 8, 2019

Respectfully submitted,

/s/ Larry Klayman  
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**CERTIFICATE OF SERVICE**

I, Larry Klayman, counsel for Plaintiffs hereby certify that on this day, July 8, 2019, a copy of the foregoing was filed via this Court's ECF system and served upon all parties and/or counsel of record.

/s/ Larry Klayman  
Larry Klayman

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**[PROPOSED] ORDER GRANTING PLAINTIFF’S REQUEST FOR RECUSAL**

Plaintiff Jerome Corsi’s Request for Recusal pursuant to 28 U.S.C. § 455 is hereby  
GRANTED.

Date: \_\_\_\_\_